

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

**DECLARATION OF BETH WILKINS IN
SUPPORT OF PLAINTIFFS' PORTION
OF JOINT LETTER REGARDING
DEFENDANTS' PRODUCTION OF
SEXUAL ASSAULT AND SEXUAL
MISCONDUCT INCIDENT DATA**
Judge: Honorable Lisa J. Cisneros

This Document Relates to:

ALL CASES

1 I, Beth Wilkins, hereby declare as follows:

2 1. I am a partner in the law firm of Chaffin Luhana LLP. I am a member of the State
3 Bars of Illinois and Missouri and duly admitted to practice before this Court, representing Plaintiffs
4 in the above caption action. If called upon to testify, I could and would testify competently to the
5 truth of the matters stated herein.

6 2. I submit this declaration in support of Plaintiffs' portion of the parties' Joint Letter
7 Regarding the Parties' dispute regarding Defendants' production of sexual assault and sexual
8 misconduct incident data.

9 3. A true and accurate copy of the August 18, 2025 Declaration of Todd Gaddis is
10 attached hereto as Exhibit A. The declaration includes a list of the Flack fields that Uber indicates
11 it has used in connection with alleged sexual assault and sexual misconduct incidents reported to
12 Uber.

13 4. A true and accurate copy of Defendants' June 27, 2024 Responses to Plaintiffs'
14 Requests for Production of Documents, Set One, is attached hereto as Exhibit B.

15 5. A true and accurate copy of an excerpt of Todd Gaddis' July 11, 2025 30(b)(6)
16 deposition transcript is attached hereto as Exhibit C.

17 6. A true and accurate copy of Uber's Incident Report Field Descriptions is attached
18 hereto as Exhibit D. Uber produced this chart on March 24, 2025 to identify the fields of data Uber
19 has produced in Bliss and Jira along with the date that Uber provided the field description to
20 Plaintiffs.

21 7. Exhibit E is a true and accurate copy of a chart Uber produced on April 23, 2025 in
22 response to Plaintiffs' interrogatory requests that sought the number of incidents, per month for
23 the years 2017-2022, that Uber categorized into its sexual assault and sexual misconduct
24 taxonomy. Uber represented that it collected this data from Bliss and Jira.

25 8. Exhibit F is a true and accurate copy of a chart that Uber produced on June 20, 2025
26 in response to Plaintiffs' interrogatory requests that sought the number of incidents, per month for
27 the years 2023-2024, that Uber categorized into its sexual assault and sexual misconduct
28 taxonomy. Uber represented that it collected this data from Bliss and Jira.

1 9. Exhibit G is a true and accurate copy of a chart that Uber produced on September
2 12, 2025 in response to Plaintiffs' interrogatory requests that sought the number of incidents, per
3 month for the years 2017-2024, that Uber categorized into its sexual assault and sexual misconduct
4 taxonomy. Uber represented that it collected this data from Flack.

5 10. Exhibit H is a true and accurate copy of an email to Uber's counsel dated September
6 14, 2024 (Pacific Daylight Time).

7
8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct.

10 Executed this 15th Day of September, 2025 in Ste. Genevieve, Missouri.

11 /s/ Beth Wilkins
12 Beth Wilkins